

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In re: ) Case No.: 18-41671  
MGTF RADIO COMPANY, LLC, ) Case No.: 18-41672  
WPNT, INC., ) Honorable Charles E. Rendlen III  
Debtors. ) Chapter 11 Proceeding  
 ) Joint Administration Requested  
 )  
 ) Hearing Date: March 29, 2018  
 ) Hearing Time: 10:30 a.m.  
 ) Hearing Location: 7 South  
 ) St. Louis, Missouri  
 )  
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**MOTION FOR JOINT ADMINISTRATION OF CASES**

COME NOW Debtors and Debtors-in-Possession MGTF Radio Company, LLC and WPNT, Inc. (“Debtors”), by and through counsel, and file their Motion for Joint Administration of Cases (the “Motion”) and in support of their Motion, state to the court:

**BACKGROUND**

1. Debtors bring this Motion pursuant to F.R.B.P. 1015. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§1334 and 157. This Motion constitutes a “core” proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1408 and 1409.
3. On March 20, 2018, (the “Petition Date”), the Debtors each filed a voluntary petition for relief (collectively, the “Cases”) under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”).

4. Since the Petition Date, Debtors have maintained possession of their assets as debtors-in-possession pursuant to Bankruptcy Code §§1107(a) and 1108.

**RELIEF REQUESTED**

5. Pursuant to Bankruptcy Rule 1015(b), Debtors request that this Court enter an order providing for the joint administration of the Cases for procedural purposes only under the Case styled *MGTF Radio Company, LLC, Case No. 18-41671* currently pending before this Court, such style and case number to be used on subsequently filed pleadings if joint administration is ordered.

6. Given the fact that the Debtors share common ownership and are affiliates as defined by the Bankruptcy Code, the procedural burdens that might be placed upon the Debtors and other creditors to file multiple pleadings in each of these Cases necessitates their joint administration.

7. The joint administration of the Cases, including the combining of notices to creditors of the respective estates, as well as calling and hearing all matters at the same time, will promote economical, efficient and convenient administration of the estates. The rights of the respective creditors of each of the estates will not be adversely affected by the joint administration since the relief sought is purely procedural and is in no way intended to affect substantive rights. Each creditor will be entitled to file a proof of claim against a particular estate if a proof of claim is required.

8. Finally, supervision of the administrative aspects of the Cases by the Office of the United States Trustee will be simplified. No substantive consolidation is sought by this Motion.

9. No administrative or scheduling orders previously entered in the Cases will require modification if this Motion is granted. Mailing lists in each of the Cases will be consolidated for future noticing requirements.

**NOTICE**

10. Notice of this Motion has been given to: (a) the United States Trustee; (b) counsel for various creditors who had contacted the Debtors and requested notices prior to the filing of the case; (c) each of the Debtors' 20 largest unsecured creditors.

11. Debtors submit that the notice provided is adequate in light of the relief requested.

WHEREFORE, the Debtors respectfully request that this Court enter an order providing for the joint administration of the Cases for procedural purposes and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

CARMODY MACDONALD P.C.

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PROPOSED ATTORNEYS FOR DEBTORS